

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**POWERTRAIN, INC., A MISSISSIPPI  
CORPORATION**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO. 1:11-cv-00105-SA-JAD**

**JOYCEMA, INDIVIDUALLY, AND  
BEST MACHINERY & ELECTRICAL, INC.**

**DEFENDANTS**

**MOTION FOR EXTENSION OF TIME**

COMES NOW, Plaintiff, by and through counsel, and move this Court for additional time in order to file a Response to Defendant Joyce Ma's Motion to Dismiss and to Transfer Plaintiff's Complaint (ED 9) filed on July 25, 2011; and, in support thereof, would show unto the Court the following:

I.

Plaintiff received electronic notification of the Defendant's Motion to Dismiss and Transfer Plaintiff's Complaint on July 25, 2011. The deadline to file a response is due this Court on August 4, 2011. The counsel for Plaintiff has been out in hearings out of county and will not have sufficient time within which to adequately prepare a Response to Defendant Joyce Ma's Motion to Dismiss and to Transfer Plaintiff's Complaint and additional time is needed in which to prepare Plaintiff's Response.

II.

The undersigned counsel for Plaintiff has conferred with Defendants' counsel regarding the requested extension of time, and Defendants' counsel has agreed to give

Plaintiff additional time to submit said response, thereby extending the deadline to September 6, 2011, if the Court will so allow. Further, Defendant's Reply to Plaintiff's Response shall then be due on September 23, 2011.

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff therefore requests that the Court enter an Order extending the deadline for Plaintiff to file its Response to Defendant Joyce Ma's Motion to Dismiss and to Transfer Plaintiff's Complaint until September 6, 2011 and Defendant's Reply to Plaintiff's Response until September 23, 2011.

Respectfully submitted, this the 29th day of July, 2011.

**POWERTRAIN, INC.**

/s/ *Duncan Lott*

DUNCAN L. LOTT, MBN 1431  
Attorneys for Plaintiff

Of Counsel:

**LANGSTON & LOTT, P.A.**

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 29<sup>th</sup> day of July, 2011, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Jeffery M. Navarro, Esq.  
jeffnavarro53@att.net  
P. O. Box 162  
Amory, MS 38821

This the 29th day of July, 2011.

/s/ Duncan L. Lott

**DUNCAN L. LOTT**